FIELD CHANGE REQUEST (FCR) FORM

Project Name: <u>Arkema Project Area –</u>	<u>PDI Pha</u>	<u>se 2</u>	Project No.: <u>CF167</u>
Client: LSS/Retia USA			Request No.: FCR-16
To: <u>Madi Novak, EPA</u>	_ Date:	March 23, 2022	

Field Change Request Title: <u>Riverbank Chemistry Soil Sampling with and Excavator.</u>

<u>Description</u>:

Riverbank soil sampling was conducted at stations RH-3 through RH-40 in July 2021. Soil samples were analyzed sequentially using the riverbank soil sample analysis decision tree as a guide (Figure 3-2d of the Arkema Project Area Pre-Design Investigation (PDI) work plan). Remediation thresholds were exceeded in the deepest soil samples collected from some of the riverbank borings. Deeper soil sampling at these locations is needed to delineate the vertical extent of remediation threshold exceedances and Table 17 COCs remaining below the remediation threshold exceedances. Soil samples deeper than approximately 4 ft cannot be collected using hand tools because of large concrete fragments and other material in riverbank soil in some parts of the Arkema Project Area. Also, refusal occurred in some of the hand auger borings before reaching the target depth of 4 ft below ground surface (bgs) due to debris in the soil. Another sample collection method will be required to collect deeper soil samples.

Recommended Change:

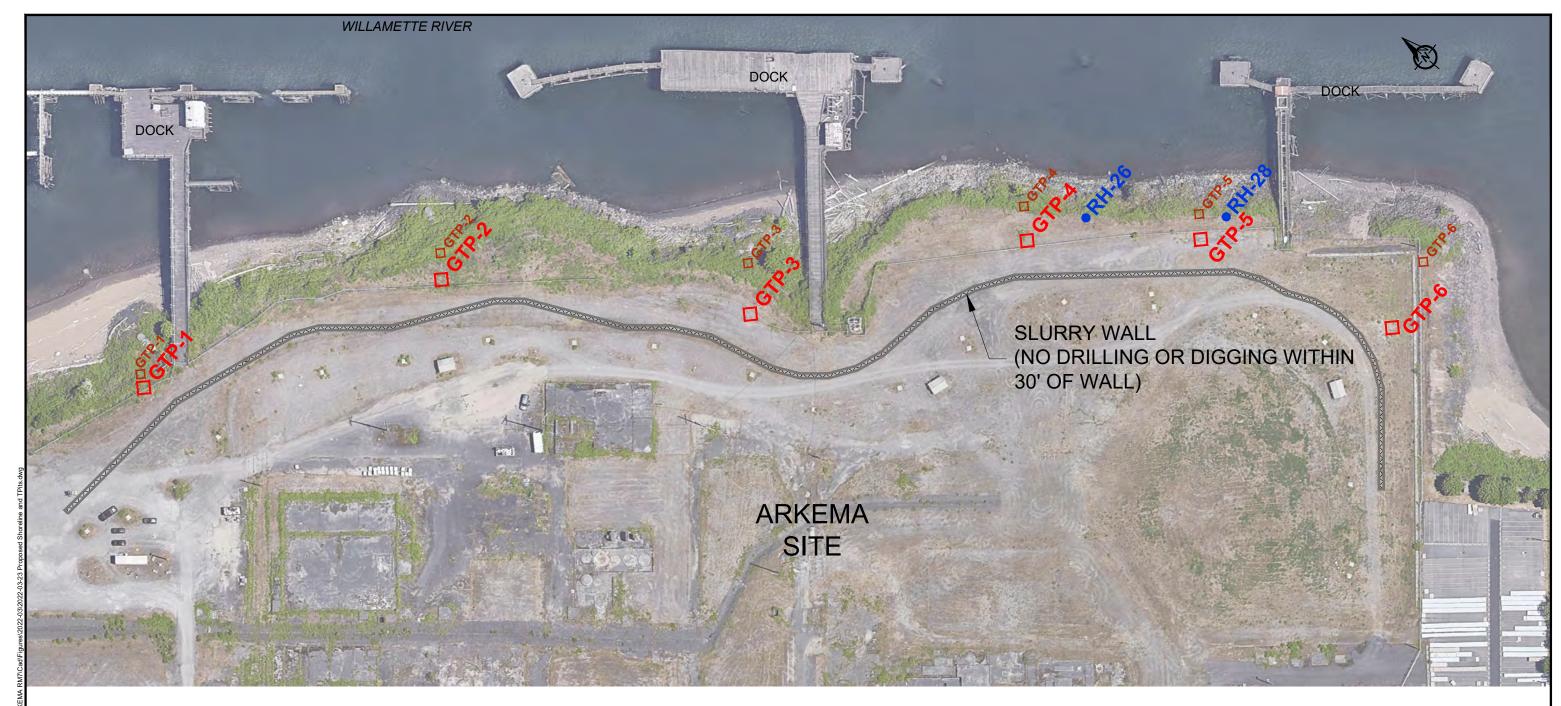
Riverbank soil stations with remediation threshold exceedances that are accessible to an excavator will be reoccupied and sampled using an excavator as deep as practicable, up to approximately 10-15 ft bgs. The stations proposed for sampling with an excavator are shown on attached Figures 1 and 2. An excavator is well suited for the soil sampling because large concrete and other refusal material can be removed from the test pit during the excavation work.

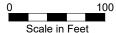
The soil sampling will follow the protocols used for the riverbank soil hand auger borings (Section 4.5.1 of the Field Sampling Plan (FSP), Appendix A to the PDI Work Plan) and the excavation procedures will follow the procedures for the test pit explorations (Section 4.5.2 of the FSP), with the following modifications. The excavator bucket will be decontaminated between stations using a pressure washer with potable water. The decontamination rinsate will be discharged to the ground surface near each test pit location. Soil samples will be collected directly from the excavator bucket; personnel will not enter the excavations for health and safety reasons. Care will be taken to collect the soil samples away from the bucket to minimize cross-contamination. Soil samples will be collected every foot starting at the bottom of the reoccupied RH boring (generally 4 ft bgs). The soil in the test pit will be photo-documented every foot using a digital camera from the ground surface near the excavation. The soil will also be photographed in the excavator bucket.

All excavated soil will be segregated by depth (approximately every 4 ft) on visqueen and returned to the test pits immediately after soil sampling activities are completed or at the end of the day, whichever comes first. The soil from the deeper portion of the test pit will be returned to the test pit first. The ground surface in the vicinity of the test pit will be leveled out to prevent future tripping hazards. The boundaries of the test pit will be marked with stakes and DGPS coordinates will be collected in accordance with Section 4.2 of the FSP (Appendix A to the PDI Work Plan).

Field Operations Lead (or designee)	Signature	<u>March 23, 2022</u> Date
Approval:	Iran Selat	
<u>Eron Dodak</u> Project Manager	Signature	<u>March 23, 2022</u> Date
<u>Madi Novak</u> EPA Remedial Project Manager	Signature	Date
<u>Distribution</u> : LSS Project Coordinator Integral Project Manager Field Operations Lead QA Officer		
Project File		

Other:





NOTES:

1. The horizontal coordinate system for the project is based on NAD83/2011 Oregon State Plane, North Zone, International Foot.

2. Background Image source: GoogleEarth 2021.

LEGEND:

♦ GTP-x TEST PIT (PROPOSED)

♦ GTP-x TEST PIT (ORIGINAL LOCATION)

• RH-xx SHORELINE BORING - FOR ADDITIONAL CHEMISTRY SAMPLING USING EXCAVATOR

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PROPOSED TEST PIT LOCATIONS

1 March 23, 2022

DRAFT

SLURRY WALL



0 100 Scale in Feet

LEGEND:

NOTES:

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2. Background Image source: GoogleEarth 2021.

• RH-xx SHORELINE BORING - FOR ADDITIONAL CHEMISTRY SAMPLING USING EXCAVATOR

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ADDITIONAL SHORELINE BORING SAMPLING



March 23, 2022